UNITED STATES DISTRICT COURT IN THE EASTERN DISTRICT OF MICHIGAN

YAACOV APELBAUM, a New York resident, and XRVISION, LTD., a New York corporation,

Plaintiffs, Case No. 2:23-cv-11718

v. Hon. Stephen J. Murphy, III

Hon. Anthony P. Patti

STEFANIE LAMBERT, a Michigan resident, and THE LAW OFFICE OF STEFANIE L. LAMBERT, PLLC, a Michigan professional limited liability company and BILL BACHENBERG, a Pennsylvania resident,

Defendants.

BURNS LAW FIRM John C. Burns Attorneys for Plaintiffs PO Box 191250 St. Louis, Missouri 63119 P: (314) 329-5040 F: (314) 282-8136 john@burns-law-firm.com STUART LAW, PLC Todd A. Stuart Attorneys for Plaintiffs 429 Turner Ave. NW Grand Rapids, MI 49504 Office: 616-284-1658 tstuart@stuartlawplc.com

DECLARATION OF JOHN C. BURNS, ESQ.

I, John C. Burns, attorney for Plaintiffs, swear under penalty of perjury that to best of my knowledge, ability and belief, the facts contained in Plaintiffs' Response to the Court's Order to Show Cause of February 16, 2024 (ECF 12) is correct and accurate.

Dated: February 20, 2024 Respectfully submitted,

/s/ John C. Burns
John C. Burns